

Regional Report Comments - Mountain Counties

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Sent: Tuesday, December 17, 2013 3:01 AM

To: DWR CWP Comments; Massera, Paul@DWR; Guivetchi, Kamyar@DWR; Moeller, Lewis@DWR

Attachments: Regional Report Comments ~1.docx (25 KB) ; Regional Report Comments D~1.pdf (348 KB)

Hi Paul,

I have attached my comments of the Draft Mountain Counties Regional Report. While I now realize the Dec 9 deadline, I hope you will accept my comments.

I will have one other comment coming from a water purveyor, likely tomorrow. I am waiting for a date to add to one of the paragraphs.

I am attaching both a PDF and Word document to make things easy, I hope.

If you have any questions, need additional information or any concerns, please let me know.

Thanks again!

John

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California Water Plan, Update 2013
Comments to the Mountain Counties Regional Report
December, 2013

To: Paul Massera, DWR

From: John Kingsbury, Mountain Counties Water Resources Association

COMMENTS

1 Page 3

Line 14 - *Delete extra comma*

Make better use of Mountain Counties' potential for alternative energy production, such as biomass,, as

2 Page 10

Line 3 - *Delete extra comma*

Sacramento-San Joaquin Delta, and from nature,, due to anticipated effects of climate change and the

3 Page 18

Line 25 – *some edits*

and departments on these matters. Formed in the 1950s, its 58 members include 17 19 water agencies and governments who meet bimonthly tri-annually, and monthly Board of Director and Legislative and Governmental Affairs Committee meetings.

4 Page 19

Line 12 - *Added the miles of designated streams*

There are 383 miles of There are streams within the Sierra Nevada ecosystem, **including** such as the Middle Fork of the Stanislaus above New Melones Reservoir, which are designated by the State as Wild Trout Streams (California Fish and Game Code Section 1726 et seq.).

5 Page 21

Line 24 - *I think the March Miracle was the previous year? Added the acre feet to provide perspective to the statement*

The ~~2011-2012~~ **2010-2011** water year is a case-in-point. Despite an extremely dry winter, carryover storage in the Mountain Counties reservoirs helped to normalize water deliveries statewide. While the carryover storage helped normalize statewide water deliveries, the existing reservoirs **and watersheds**

alone were not adequate to retain the substantial rainfall (800 af) from the previous water year, which just flowed to the sea.

6 Page 22

Line 20 – *starting at Line 20 – this is not limited to NID and PCWA. It is regional by nature*

Typically, water conservation has been associated with curtailment of water use and doing more with less water during a water shortage, such as a drought. By conserving water and by purchasing more water efficient products, water consumers can help mitigate the local effects of drought and also save money on their water and energy bills. Using water more efficiently helps retain water supplies at safe levels, protects human health and the environment, and ensures reliable water supplies today and for future generations. The Nevada Irrigation District (NID), and Placer County Water Agency (PCWA), El Dorado Irrigation District, Amador Water Agency, Calaveras County Water District, Tuolumne Utilities District and others, all both located within the Mountain Counties Area, aggressively implement water conservation programs to ensure water supplies are available in the future. Within their current water conservation programs, NID the water purveyors implements water conservation measures at the district level using supply management and at the consumer level using demand management. The demand management measures currently utilized may include:

7 Page 22

Line 33 - *PCWA also fully metered since 1968. Delete extra period.*

Since 1968, NID and PCWA's treated water connections have been fully metered and billing rates have been based on the volume of water used. In 2000, NID began a 5-year retrofit program to replace aging meters within the system to improve accuracy of meter readings and continue water efficiency practices.

8 Page 22

Line 39 - *This is not limited to PCWA as aggressive water use efficiency programs are seen throughout the region and should be reflected as such.*

As an example of effective water use efficiency programs in Mountain Counties, PCWA offers on-site water efficiency survey services such as rebate programs, water wise house calls, water wise business calls, and landscape irrigation surveys.

9 Page 25

Line 7 – *Not just rivers*

Environment - Fish, wildlife, and native plants including a number that are rare, threatened, or endangered, depend on water to thrive. The snow and rain that falls in the region serves a delicate ecological system, which is supported through actively managed conservation work. The creeks, streams, canals, ravines, and rivers within the Mountain Counties Area also play a critical role in the lifecycle of anadromous fish, including salmon and steelhead.

10 Page 25

Line 35 - *Added reference to this statement.*

Despite these benefits of more than \$1.9 billion per year, there is very little outside reinvestment in the Sierra Nevada ecosystem to continue providing these and other important benefits. **In the 1996 Sierra Nevada Ecosystem Project (SNEP) assessment of the Sierra Nevada ecoregion, which was released to Congress noted that:**

- **Development of streams and other resources of the Sierra Nevada over the past 150 years has met the downstream demands of society throughout California, but has impaired the quality and availability of water for both ecological and social needs in many parts of the mountain range**
- **The connection between watershed condition and downstream water quality is rarely recognized by water users**
- **Almost none of the high economic value of water at its end use is returned to the source area**
- **Sierra runoff accounts for an even larger proportion of the developed water resources and is critical to the state's economy**

11 Page 26

Line 9 - *Add substance - as reflected from DWR information*

According to the "Climate Change Handbook for Regional Water Planning", hydropower is a significant clean energy source in California: 21% of the state's electricity is generated from hydropower (CAT 2008). As spring snow-melt timing shifts, power generation operations may also need to shift to accommodate flood control (DWR 2008). Maximum power generation capacity may not coincide with maximum energy demands in the hot summer months. Several studies have projected various levels of hydropower losses. The California Climate Action Team projected that power generation will decrease by 6% by the end of the century for the State Water Project system, and by 10% for the Central Valley system (CAT 2009). Higher elevation hydropower generation units may see a decrease of as much as 20% of annual power generation (Medellin-Azuara et al 2009).

The significance is that tThere are well over 100 hydroelectric projects **at these higher elevations** within the Sierra Nevada, **more** **that any other region in the State** that are licensed by FERC under the authority of the Federal Power Act, with license periods extending up to 50 years.

12 Page 27

Line 31 - *Added note which rarely considered in statewide water issues*

Ditch Systems are directly associated with mining and hydroelectric power industries, land settlement community development, agriculture, and logging and played a substantial part in the economic and corporate development of the region and the rest of the state. Ditch systems provide water for many beneficial uses, defined in CWC Section 1243. **Ditch systems are conveyance arteries in the Sierra.** **Unlike earthquakes that can disrupt water supply in other regions, the Sierra is vulnerable to landslides, which can and has severed communities from water supply.**

13 Page 31

Line 4 - *Not entirely correct – this should include surface storage, not just streams*

Drought is a serious concern, especially for the area's smaller water systems that are dependent on the groundwater from fractured rock or small surface streams **and/or reservoirs** in the **Sierra foothills**. Since **many** of these small systems are relatively isolated in rough terrain where it is impractical to build interties with other systems, **thus making surface storage the only viable source of water supply.**

14 Page 35

Line 26 - *Consequences don't stop in the Sierra - Should mention downstream issues to make it important folks outside this region.*

from economic losses in the timber and tourism industries. Following a fire, intense rainstorms can also result in flash flooding, landslides, or large erosion events which damage communities, infrastructure, and reduce water quality in the area, **increase flooding downstream, which adds stress on the Delta levee system.**

15 Page 50

Line 23 - *This statement does not reflect original language, is incorrect and short-sided. Fixed.*

Provide funding for feasibility study, project design, and project construction monies ~~for the mini-raises of small reservoirs~~ **to raise existing reservoirs** where appropriate

16 Page 53

Line 3 – *Need ability to include cost to repair and replace aging infrastructure – added language*

A. Establish rate structures for water services based on measured volumes utilized and actual overall costs incurred to deliver from point of origin to point of use, **and the cost to repair and replace aging infrastructure.**